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Investigation by the Department of Telecommunications)	
and Energy on its own motion, pursuant to G.L. c. 164,)	
§§ 1E, 76 and 93, into Massachusetts Electric)	
Company's service quality filings, including but not)	D.T.E. 01-71B
limited to, their service quality filings submitted in)	
response to Service Quality Standards for Electric)	
Distribution Companies and Local Gas Distribution)	
Companies, D.T.E. 99-84)	
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INSTRUCTIONS

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Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.

6. Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.
7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recording system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
9. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.
10. If, in answering any of these Document and Information requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.

12. Provide copies of all requested documents. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.
13. If you refuse to respond to any Document and Information Request by reason of a claim or privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation which supports the response provided.
15. Provide two copies of each response.
16. The terms “Company” or “Companies” refer to Massachusetts Electric Company and Nantucket Electric Company. Unless the request specifically provides otherwise, the term Company includes all witnesses, representatives, employees, and legal counsel.
17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.

The following is the Attorney General's FIRST SET of Document and Information Requests in the above referenced docket.

- AG-1-1 Please provide for each, Massachusetts Electric Company and Nantucket Electric Company, all materials filed in compliance with the Service Quality components of the Department's orders in D.T.E. 99-47. Include all supporting calculations, source data, details of any excluded data (description of the excluded item and rationale for each exclusion), and assumptions supporting the service quality benchmarks and any penalty/incentive proposals. This response must include data supporting the \$3,675,000 accrued incentives for the period May 1, 2000 through December 31, 2000 and the 2001 benchmarks. See the Companies' August 8, 2001 filing, Attachment 8 to Companies' December 14, 2001 filing, D.T.E. 01-71B. In addition to a hard copy response, all calculations and computations should be provided in the form of working (including working formulae with all related and referenced spreadsheets) Excel 2000 or Lotus 123 ver. 9.5 for Windows compatible spreadsheets.
- AG-1-2 Please provide copies of all (internal and external) communications (both written and oral), e-mail, memoranda, and notes of telephone conversations and meetings related to compliance with the Department's service quality provisions of the orders in D.T.E. 99-47. This response should include all materials filed and related to the Companies' performance during the period beginning with the effective date of the approved Service Quality Plan that have not been provided in response to the immediately preceding request.
- AG-1-3 Please provide copies of all (internal and external) communications (both written and oral), e-mail, memoranda, and notes of telephone conversations and meetings held with and between the Department and the Companies and within the Company after October 29, 2001 regarding the Companies' Service Quality Plans.
- AG-1-4 Using the format of the Companies' August 8, 2001 filing in D.T.E. 99-47, please provide calculations and schedules that reflect the Company's actual performance for the period, January 1, 2001 through December 31, 2001. This response should incorporate the settlement service quality standards approved in D.T.E. 99-47. Include all supporting calculations, source data, details of any excluded data (description of the excluded item and rationale for each exclusion), and assumptions. In addition to a hard copy response, all calculations and computations should be provided in the form of working (including working formulae with all related and referenced spreadsheets) Excel 2000 or Lotus 123 ver. 9.5 for Windows compatible spreadsheets.
- AG-1-5 Please explain any and all computational or methodological differences between

how the Company has determined the standard deviation for the service quality standard in the Companies' August 8, 2001 compliance filing and those calculations contained in the proposed "Alternative Plans" and the "Guideline SQ Plans" contained in the Companies' December 14, Filing (Attachments 6, 7, 15, and 16). Include an explanation for the differences and why one was used and not another.

- AG-1-6 Please explain any and all computational or methodological differences in the methods used to collect and compile data and the actual data used in developing the service quality standards included in the Companies' "Revised Service Quality Plan" filed on October 29, 2001 and those used in developing the standards included in the proposed "Alternative Plans" and the "Guideline SQ Plans" contained in the Companies' December 14, Filing (Attachments 6, 7, 15, and 16). Include an explanation for the differences and why one method or data source or period was used in one and not another. This response should address explicitly the differences in the historical reliability data.
- AG-1-7 Have any of the actual 2001 performance statistics been updated or revised since the Companies compiled the data included in the December 14, 2001 filing? If yes, please provide updated/revised schedules that are affected. Include all supporting calculations, source data, details of any excluded data (description of the excluded item and rationale for each exclusion), and assumptions. In addition to a hard copy response, all calculations and computations should be provided in the form of working (including working formulae with all related and referenced spreadsheets) Excel 2000 or Lotus 123 ver. 9.5 for Windows compatible spreadsheets. If no, please explain when final statistics will be available and provide the requested updates at that time.
- AG-1-8 Please provide the details of any customer guarantee payments made by each Company for the periods May 1, 2000 through December 31, 2000 and the calendar year 2001. Provide the dollar amount for each rate class aggregated by the general reason for the payment (no notice of scheduled outage, missed service appointment, etc.).
- AG-1-9 Please provide the amount of costs that the Companies' might seek to claim as exogenous costs under the "Rate Plan Settlement" should the Department not approve the proposed Alternative SQ Plan. If the Companies views these costs as recurring annually, please provide an estimate of the future annual cost and the period over which the exogenous cost recovery would extend. When would the Companies file for recovery of these costs? In addition to a hard copy response, all calculations and computations should be provided in the form of working (including working formulae with all related and referenced spreadsheets) Excel

2000 or Lotus 123 ver. 9.5 for Windows compatible spreadsheets.

- AG-1-10 Refer to Mr. McLaren's testimony, page 17, lines 14-17. Please provide a calculation of the Companies' "average distribution rates" for each year 1997 through 2001 and "the state-wide weighted average distribution rate" for each of the years 1997 through 2001. Include an explanation of how each company's rates were calculated, identify the sources of the data used, explain the basis for excluding any data, and any assumptions made in compiling the data. In addition to a hard copy response, all calculations and computations should be provided in the form of working (including working formulae with all related and referenced spreadsheets) Excel 2000 or Lotus 123 ver. 9.5 for Windows compatible spreadsheets.
- AG-1-11 Please provide 10 years of statistics and information for each Company for the following reportable items, as required in the Service Quality Plans (included in the Companies' December 14, 2001 filing), sections IV and VIII:
- Staffing Level in compliance with G.L. c. 164, § 1E,
 - CAIDI,
 - Electric Distribution Line Loss,
 - Restricted Work-Day Rate,
 - Damage to Company Property,
 - Annual Major Outage Events,
 - Capital Expenditure Information,
 - Spare Component and Acquisition Inventory Policy and Practice,
 - Poor Performing Circuits,
 - Electric Service Outages, and
 - Other Safety Performance Measures.
- In cases where 10 years of data are not available, provide the data for the years available and explain why older data not available.
- AG-1-12 Please provide the results of all customer surveys conducted by the Companies (together or individually) during the past 10 years. The results should clearly identify for each survey the purpose of the survey, the dates the survey was conducted, the survey method (telephone, mail, e-mail, in person, etc), how the surveyed group was selected, the statistical validation of the survey, the identity of the survey designer and who actually conducted the survey, tabulated and interpreted the results. Provide copies of each questionnaire or script used.
- AG-1-13 Please provide, separately for each of the Companies, a 10 year history of billing adjustment amounts by customer class . Identify bad debt write-off amounts separately. Identify billing adjustment amounts related to DTE intervention cases separately. If a full 10 years of data is not available for each of the Companies, please provide the data available. Include all written policies and or guidelines

used by Company personnel in adjusting customer bills and any review process related to bill adjustments.

- AG-1-14 Please provide, separately for each of the Companies, a 10 year history of all “Excludable Major Events,” as defined in the Service Quality Plans filed December 14, 2001 and the Plan in effect May 1, 2000 through December 31, 2000. Identify the events in each year by the three categories included in the definition of Excludable Major Event in the proposed Alternative Plans and the Guideline SQ Plans, identify events that qualified under the May 1, 2000 through December 31, 2000 Plan only, provide the duration and dates of each event. Describe how the Companies categorize events—who is responsible and provide copies of all written guidelines used to make the determinations and any review process employed by the Companies. If a full 10 years of data is not available for each of the Companies, please provide the data available.
- AG-1-15 Regarding Customer Service Guarantees, please provide each Companies’ policy regarding customer notification of scheduled service interruptions. Include the definition of a “scheduled service interruption,” the minimum notice required, method of notification (phone, mail), what records are kept and used to validate a customer’s claim of no or inadequate notice?
- AG-1-16 Please provide all historic MAIFI data for each of the Companies. Please explain how this data is/was collected (how recorded, method of recording, what level of aggregation was used in reporting the data, etc.), to whom it was reported (internally and externally), and if it is no longer being collected, explain why. Include copies of all related procedures, policies and guidelines related to the collection and reporting of outage data used by the Companies.
- AG-1-17 Please provide a copy of the recently completed revised IEEE 1366-1998, “Guide for Electric Power Distribution Reliability Indices” referred to by Mr. Bouford in his testimony. Explain how this guide is used, what reliability indices and data are available through IEEE or other organizations and how the Companies participate in the data collection and submission of index data to any external organization.

Dated: January 8, 2002.